



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

OCT 27 1997

Ref: 8ENF-T

Mr. Daniel Lusk, Director
Cherokee Station
Public Service Company
6198 Franklin Street
Denver, CO 80216-1211

Re: Resource Conservation and
Recovery Act (RCRA)
Inspection of EPA
ID# COD980286017
September 26, 1997

Dear Mr. Lusk:

This letter serves to notify you that, at this time, the EPA has concluded the activities associated with the above referenced inspection. A copy of the inspection report is enclosed for your records. The Agency has determined that Cherokee Station, Public Service Company, Denver, Colorado, was found to be in compliance with RCRA requirements for a Small Quantity Generator of hazardous waste for the portion of the facility observed by the RCRA inspector.

Please be aware, however, that you are responsible for remaining in compliance with RCRA and other applicable Federal regulations relating to your activities, and that this letter does not constitute a bar to enforcement action as a result of conditions or information which the Agency is not presently aware of or has not yet fully considered; or conditions the Agency may find during future inspections of your facility.

If you have any questions about this letter, please contact me at (303) 312-6503.

Sincerely,

A handwritten signature in cursive script that reads "Linda Jacobson".

Linda Jacobson
Environmental Engineer
Technical Enforcement Program

Enclosure

cc: Kathy Wahlberg, CDPHE



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U.S. EPA REGION VIII

RCRA COMPLIANCE INSPECTION REPORT

Facility: Cherokee Station
Public Service
6198 Franklin Street
Denver, Colorado 80216-1211
Denver County

Facility Contact: Daniel Lusk, Director

Telephone Number: (303) 853-7219

EPA I.D. No.: COD980286017

Notification Status: SQG

Inspection Type: Compliance Evaluation Inspection

Date: September 26, 1997

Time In: 8:35 a.m.

Time Out: 11:00 a.m.

Weather: Clear, Warm

Inspector: Linda Jacobson, EPA Inspector

Facility
Representatives: Daniel Lusk, Station Director
Nick Pizzuti
Ken Okazaki
Tom Hess
Bill Houston

The EPA inspector, Linda Jacobson, arrived at the facility at 8:35 a.m. on September 26, 1997, and presented her credentials to Daniel Lusk, Station Manager, and the other facility representatives present. Mr. Lusk granted access by consent and initialed the Notice of Inspection (NOI) to indicate such.

Ms. Jacobson explained the intent of the inspection was to ascertain the facility's compliance with the RCRA requirements applicable to a Small Quantity Generator. Following a physical site inspection of the satellite accumulation areas and the waste generation points, Ms. Jacobson indicated that she would review the following records: manifests and other shipment records, training records, inspection records, and spill records.

Cherokee Station has 165 employees. The plant operates three 8-hour shifts. The waste streams generated include: waste solvent, used oil, oily debris, paint debris, aerosol cans, dry cell batteries, mercury debris from draining some instruments and from phasing out field mercury flow meters, fluorescent light bulbs which are being collected for recycle.

Cherokee has three satellite accumulation areas. The plant also has 1 hazardous material accumulation building. The Shift Supervisor serves as the Emergency Coordinator.

Physical Site Inspection

In the Maintenance Area, we looked at one of the parts washing machines. Cherokee has used citrus-based solvent since 1995. The filters from the parts washing machine are recycled by Safety-Kleen. There was one drum labeled "Used Parts Washer Filters", which are changed once per month by Safety-Kleen.

We looked at each of the satellite accumulation points, the Number 4 Laydown Area, the Number 3 Boiler Bottoms, and the Number 1 Coal Mill area. We also inspected the Hazardous Waste Storage Area.

At the first satellite accumulation area, the Laydown Area, there were two Flammable Cabinets. The first Flammable Cabinet contained 2 drums: 1 Used Aerosol Cans (on drum) and one drum with a Hazardous Waste (label) "Solvent Debris". The second Flammable Cabinet contained the following drums: one drum with a Hazardous Waste label, "Used/Waste Solvent" and one drum, "Waste Paint" with a Hazardous Waste label. Outside the Flammable Cabinets, there were drums being stored on pallets consisting of the following:

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Mr. Okazaki explained the difference between the "Used/Waste Solvent" and the "Solvent Debris". The "Used/Waste Solvent" is liquid. The "Solvent Debris" consists of rags and cleanup material.

We then went outside and looked at the Used Oil tank and container. Both were appropriately labeled. Safety-Kleen recycles the used oil.

We then looked at the second satellite accumulation area, the No. 3 Boiler Bottom. There were 2 drums on a pallet, labeled as "Oily Debris" and "Paint Debris". Both were 55-gallon black steel, non-hazardous drums. If it is suspected that lead paint will be encountered during maintenance, Cherokee Station sets up a special drum for lead debris or abatement.

The Flammable Cabinet at the No. 3 Boiler Bottom satellite accumulation area contained 2 black 55-gallon drums inside, labeled as "Used/Waste Solvent" (liquid), and "Aerosol Cans".

We looked at the third satellite accumulation area, the Number 1 Coal Mill. Inside the Flammable Cabinet were 2 black 55-gal drums, labeled as "Oily Debris" (non-haz.) and "Aerosol Cans (haz)". In this area, there was one blue plastic drum on a pallet for dry cell batteries.

We also looked at several empty fire extinguisher cylinders. Cherokee indicated that a company picks these up and refills them.

In the Locomotive Bay, we saw two green drums labeled "Used Oil Filters Only". These are picked up by Safety-Kleen and are managed as a non-hazardous material.

We went to the Control Room to verify the information kept there as far as fire department numbers, spill equipment locations, etc. Everyone in the plant dials one number to get the Control Room. The Control Room has a book, the Emergency Plan notebook, which contains the fire extinguisher locations, the fire department number and emergency contact numbers. They also have posted in Control Room, the telephone numbers for the Fire Department and Emergency Telephone Numbers and the Spill Kit location for # 4 Laydown.

We then inspected the Hazardous Waste Storage Area. This area, which is the formal waste accumulation area, was appropriately signed, fenced, and locked. The emergency telephone numbers are posted on the gate to the Hazardous Waste Accumulation Area.

Inside the Hazardous Waste Storage Area is an aerosol puncture drum labeled "Waste Paint", with a Hazardous Waste Label. The other wastes stored in this area included the following:

- 4 drums Anodes (recycle) Magnesium, non haz.
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- 1 drum overpacked, Liquid Cleaning Compound NA1760 and a corrosive label, labeled "This Container on hold pending analysis" They overpacked a 55-gallon drum found on the plant, awaiting analysis.
- 1 55-gallon drum, Lathe Coolant, 9/18/97 on Hazardous Waste label, hazardous for lead, 190 lbs.
- 1 55-gallon drum Hg Waste, 8/4/97, Waste Solvent
- 1 tub, Batteries, Lithium and NiCad
- 1 yellow overpack, Hg Debris, includes Tyvek, Gloves, Tubing, etc., Accum Date 9/19/97.
- 1 black 55-gallon drum, Hg Contaminated Water, plant instruments, pending analysis
- 1 55-gallon drum, RQ, Hg, UN280, liquid mercury, in steel flasks, 11 flasks, packed in vermiculite, 250 ml bottle in metal flask.

There were numerous drums of industrial waste, stored outside Hazardous Waste Accumulation Area. These have been characterized as non-hazardous and are disposed at CSI, including batteries. Shipments/waste profiles are handled by PSC, Environmental Services (central office downtown). The Industrial Waste Storage includes:

- Used Oil
- Paint debris
- Oily Debris
- Sandblast Residue
- Used/Waste Solvent debris
- Used Oil, Sorb and Debris
- Booms & Oil--turbine oil from Lift Station
- Laydown Paint Debris
- Turbine Oil and Water
- Filters EMD

Records Review

We returned to the office. Ms. Jacobson reviewed waste manifests, inspection and training records. There were no spill records, since there were no reportable hazardous waste spill quantities.

Waste Manifests were reviewed from 1994 to the present. There were no hazardous waste shipments in 1996. Used oil shipments were also reviewed. The used oil is sampled for PCBs and halogens by Public Service Company. Ms. Jacobson reviewed the used oil shipment for 6/6/97 of 1630 gallons where this analytical screening was performed.

During the chemical cleaning of the boilers, the EDTA chelant picks up metals. The liquid is put into a tank and then blown into the boiler at 80 to 100 gal/min above the fire ball. Cherokee Plant has permission from the State Air people (CDPHE) to do this but they notify the State Air staff each time, prior to a cleaning. There are 100,000 to 120,000 gallons generated each cleaning, which includes 40,000 gallons rinse.

Ms. Jacobson reviewed the training which was conducted and planned. Training is scheduled for November 1997, onsite. Prior to this year, the training was held at Front Range where the employees received a 24-hour training class. The Production and Systems Operation, General Compliance Training 1997, manual includes units on:

- Haz. Material Awareness
- Emergency Action Plan
- Waste Management
- Air Monitoring Equipment
- PPE
- Respiratory Protection
- Excavation
- Safety Hazards
- Confined Space Overview

The Cherokee Station has training guides for each job classification, which includes emergency procedures guide. This training is given as a one-time training to new workers or when workers are assigned to new jobs. Cherokee has modules for each job description that include task specific training. The employee has to be trained before assuming the job. Ms. Jacobson reviewed an example of one of these modules for the General Plant Specialist B, Waste Water Operations, which included use of protective equipment such as eye protection, working with compressed gas, etc. Additionally, Safety Meetings are held once per month.

Ms. Jacobson reviewed the Waste Management Logs (Inspection Logs) for the Hazardous Waste Accumulation Area and the three satellite accumulation areas. There were no weekly inspections conducted from 6/25/97 to 7/10/97 and 8/5/97 and 8/19/97 for the Hazardous Waste Accumulation Area. There were no weekly inspections from 8/25/97 to 9/12/97 for the No. 4 Laydown, No. 3 Boiler Bottoms, and the No. 1 Coal Mills. There were no consistent inspection logs maintained before May 1997, when

Mr. Okazaki began to perform this job. The inspections were being conducted weekly on the job shifts but no records were maintained consistently until May 1997.

The chemist, Mr. Bill Houston, joined us. He indicated that the laboratory here is not a satellite accumulation area. When he has an expired reagent, he sends it to Mr. Okazaki for disposal.

CLOSING CONFERENCE

Ms. Jacobson completed the Notice of Inspection form. Cherokee Station was informed that the inspection report would be ready in 45 days and that a copy of it and a copy of the photos would be provided.

SUMMARY OF FINDINGS/CONCLUSIONS

Based on information provided during this inspection, Cherokee Station is a SQG of hazardous waste. Cherokee Station is complying with the RCRA SQG requirements. As noted on the NOI, Cherokee Station needs to ensure that all weekly inspections of hazardous waste accumulation areas and satellite accumulation areas are being conducted.

Prepared by: Linda Jacobson 10/27/97
Linda Jacobson Date
EPA Inspector

Photo Log

- Photo 1 Laydown Satellite Accumulation Area, Flammable Cabinet 1
- Photo 2 Laydown Satellite Accumulation Area, Flammable Cabinet 2
- Photo 3 Drums on Pallets at Laydown Satellite Accumulation Area
- Photo 4 No 3 Boiler Bottom Satellite Accumulation Area
2 drums on pallet
- Photo 5 No. 3 Boiler Bottom Satellite Accumulation Area
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- Photo 6 Number 1 Coal Mill Satellite Accumulation Area
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- Photo 7 Drums of Waste in Hazardous Waste Accumulation Area
- Photo 8 Part of Industrial Waste Storage Drums



Photo 1: Laydown Satellite Accumulation Area
Flammable Cabinet 1



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Flammable Cabinet 2



Photo 3: Drums on Pallets at Laydown
Satellite Accumulation Area



Photo 4: No. 3 Boiler Bottom Satellite Accumulation Area
2 Drums on Pallet



Photo 5: No. 3 Boiler Bottom Satellite Accumulation Area
Inside Flammable Cabinet



Photo 6: No. 1 Coal Mill Satellite Accumulation Area
Inside Flammable Cabinet



Photo 7: Drums of Waste in Hazardous Waste Accumulation Area



Photo 8: Part of Industrial Waste Storage Drums Beside Hazardous Waste Accumulation Area

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

999 18th St. Suite 500, Denver, CO 80202-2413

NOTICE OF INSPECTION

PROGRAM

<input checked="" type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended. <input type="checkbox"/> Toxic Substances Control Act (TSCA) Public Law 94-469, as amended. <input type="checkbox"/> Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended.							
Date 9/26/97	Inspector #	Daily Seq.	Hour IN: 8:35 am OUT: 11:00 am	CMO Fac.	Facility name Public Service Co. of Colorado Cherokee Station	EPA I.D. # CO0980286017	
Fac. Func.	Invest. Type	FATES Reason	RCRA: Gen. () Transp. () TSD ()	Street 6198 Franklin St Denver, CO 802161211			
Facility Representative(s) Daniel Lusk			Title Director		City Denver	State CO	Zip 802161211
Phone # () - () (303) 853-7219							
Reason for Inspection: Entry by Consent: <input checked="" type="checkbox"/> <u>D. M. Lusk</u> Warrant: () <input checked="" type="checkbox"/> To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs. <input type="checkbox"/> Other (Specify) _____ Violations of above referenced law are suspected from information or complaint. Yes () No ()							
Samples, Documents, and/or Photos collected (describe below)						Medium	Date to Lab
1. 8 photographs							
2.							
3.							
4.							
5.							
6.							
Samples requested and received by facility: () Yes () No If yes: () Duplicate. () Split. () Photos (To be received when processed.)							
This inspection has revealed the following probable violations of EPA laws or regulations. All weekly inspections of hazardous waste accumulation area and satellite areas were not being conducted. Need to ensure all weekly inspections are performed.							
The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.							
Receipt of this Notice of Inspection is acknowledged. <u>D. M. Lusk</u> (Signature of facility representative)				Signature of Lead Inspector <u>Linda Jackson</u> Assisting Inspectors (EPA/Contr./State)			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA NO. C17
FILE NO. Feb 30

REGION VIII

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Denver County

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Prepared by:

Linda Jacobson 10/27/97
Linda Jacobson Date
EPA Inspector

Photo Log

- Photo 1 Laydown Satellite Accumulation Area, Flammable Cabinet 1
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- Photo 3 Drums on Pallets at Laydown Satellite Accumulation Area
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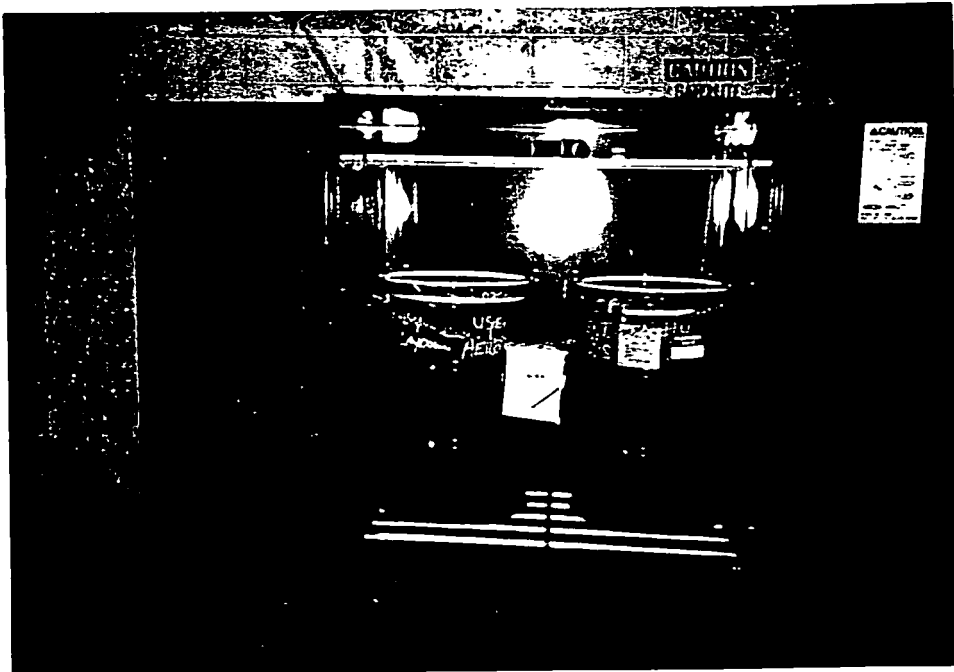


Photo 1: Laydown Satellite Accumulation Area
Flammable Cabinet 1



Photo 2: Laydown Satellite Accumulation Area
Flammable Cabinet 2



Photo 3: Drums on Pallets at Laydown
Satellite Accumulation Area



Photo 4: No. 3 Boiler Bottom Satellite Accumulation Area
2 Drums on Pallet



Photo 5: No. 3 Boiler Bottom Satellite Accumulation Area
Inside Flammable Cabinet



Photo 6: No. 1 Coal Mill Satellite Accumulation Area
Inside Flammable Cabinet

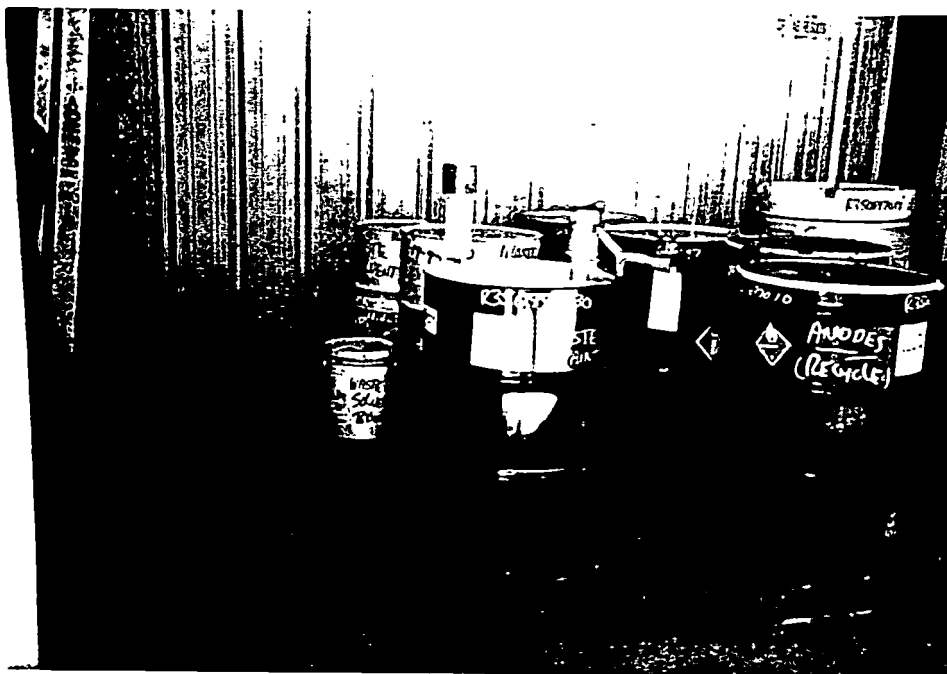


Photo 7: Drums of Waste in Hazardous Waste Accumulation Area



Photo 8: Part of Industrial Waste Storage Drums Beside Hazardous Waste Accumulation Area

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

999 18th St. Suite 500, Denver, CO 80202-2413

NOTICE OF INSPECTION

PROGRAM

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Facility Representative(s) Daniel Lusk				Title Director			
Phone # () - () (303) 853-7219				City Denver	State CO	Zip 80216-1211	
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Samples, Documents, and/or Photos collected (describe below)						Medium	Date to Lab
1. 8 photographs							
2.							
3.							
4.							
5.							
6.							
Samples requested and received by facility: () Yes () No If yes: () Duplicate. () Split. () Photos (To be received when processed.)							
This inspection has revealed the following probable violations of EPA laws or regulations. All weekly inspections of hazardous waste accumulation area and satellite areas were not being conducted. Need to ensure all weekly inspections are performed.							
The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.							
Receipt of this Notice of Inspection is acknowledged. D. M. Lusk (Signature of facility representative)				Signature of Lead Inspector Linda J. Anderson Assisting Inspectors (EPA/Contr./State)			